

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

ALL MATTERS RELATED TO NORTH
AMERICAN REFRACTORIES
COMPANY, *et al.* in Case No. 02-20198, as
affected by the May 24, 2013 Order
Entering Final Decree entered at Doc. No.
7940

Debtors.

Misc. Case No. 15-00204-TPA

Chapter 11

HONEYWELL INTERNATIONAL INC.,

Plaintiff,

v.

NORTH AMERICAN REFRACTORIES
COMPANY ASBESTOS PERSONAL
INJURY SETTLEMENT TRUST,

Defendant.

Adv. No. 21-2097

Related to Doc. No. 333

Hearing Date & Time: May 5,
2020 at 11:00 a.m.

**NOTICE OF PARTIAL WITHDRAWAL OF MOTION TO PRECLUDE THE FILING
OR ADMISSION INTO EVIDENCE OF NON-PARTY CLAIMANT LAW FIRM
IDENTIFYING INFORMATION**

PLEASE TAKE NOTICE that the North American Refractories Company Asbestos Trust Advisory Committee (the “TAC”) and the Future Claimants’ Representative (“FCR”), through their undersigned counsel, hereby withdraw that portion of their Motion to Preclude the Filing or Admission into Evidence of Non-Party Claimant Law Firm Identifying Information (the “Motion”) seeking to preclude the filing of documents, or admission at trial of evidence, containing identifying information regarding law firms that represent individual claimants. The movants maintain the request for an order confirming the agreement by Honeywell, the Trust, the TAC and

the FCR as to the redaction of individual claimant identifying information from trial materials and filings, such as names, addresses, and social security numbers.

While the TAC and FCR believe that the relief sought in the Motion is appropriate, the TAC and FCR have determined that withdrawal of that portion of the Motion seeking redaction of law firm identifying information is in keeping with the Parties' efforts to focus on the specific matters at issue in these proceedings.

As noted in the Motion, and as confirmed by Honeywell and the Trust, the Parties have agreed to redact from filings and exhibits offered into evidence personal identifying information about individual asbestos claimants. Such a procedure is consistent with applicable law, including 11 U.S.C. § 107(c), and appropriate to protect individual claimants' privacy concerns. *In re Motions Seeking Access to 2019 Statements*, 585 B.R. 733, 760 (D. Del. 2018) (confirming bankruptcy court order implementing procedures to protect the privacy and personal identifying information of individuals with asbestos personal injury claims under 11 U.S.C. § 107(c)), *aff'd sub nom. In re AC&S Inc.*, 775 F. App'x 78 (3d Cir. 2019).

A revised proposed order on the Motion conforming with this Notice is attached.

Dated: May 3, 2022
Pittsburgh, Pennsylvania

STONECIPHER LAW FIRM

/s/George T. Snyder
George T. Snyder, Esq.
PA ID No. 53525
125 First Avenue
Pittsburgh, PA 15222
Telephone: (412) 391-8510
Facsimile: (412) 391-8522
Email: gsnyder@stonecipherlaw.com

-and-

CAPLIN & DRYSDALE, CHARTERED

James P. Wehner, Esq. (admitted *pro hac vice*)
Todd P. Phillips, Esq. (admitted *pro hac vice*)
Katy Zende, Esq. (admitted *pro hac vice*)
George O'Connor, Esq. (admitted *pro hac vice*)
One Thomas Circle, NW, Suite 1100
Washington, DC 20005
Telephone: (202) 862-5000
E-mail: jwehner@capdale.com
tphillips@capdale.com
kzende@capdale.com
goconnor@capdale.com

*Counsel for the NARCO Asbestos Trust
Advisory Committee*

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Edwin J. Harron (DE Bar No. 3396)
Sharon M. Zieg (DE Bar No. 4196)
Sara Beth A.R. Kohut (DE Bar No. 4137)
James L. Higgins (DE Bar No. 5021)
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Email: eharron@ycst.com

szieg@ycst.com

skohut@ycst.com

jhiggins@ycst.com

-and-

SHERARD, GERMAN & KELLY, PC.

/s/ Jennifer P. Richnafsky

Gary Philip Nelson (P.A. Bar No. 27603)

Jennifer P. Richnafsky (P.A. Bar No. 314764)

535 Smithfield Street, Suite 300

Pittsburgh, PA 15222

Telephone: (412) 258-6720

Facsimile: (412) 261-6221

Email: gpn@sgkpc.com

jpr@sgkpc.com

Counsel for the Future Claimants' Representative